

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RYAN, LLC,

Plaintiff,

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA, *et al.*,

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

CASE NO.: 3:24-CV-986-E

**MOTION OF PROSPECTIVE *AMICUS CURIAE* AMERICAN ACADEMY OF
EMERGENCY MEDICINE TO WAIVE LOCAL COUNSEL REQUIREMENT
OF LOCAL RULE 83.10**

Non-party and prospective *amicus curiae* the American Academy of Emergency Medicine (AAEM), through undersigned counsel and pursuant to N.D. Texas L.R. 83.10(a), respectfully moves this Court for leave to waive that rule's requirement to obtain local counsel. In support, prospective *amicus* states:

1. Prospective *amicus* is the American Academy of Emergency Medicine, a three decade-old organization representing more than 8,000 board-certified emergency room physicians nationwide. In Texas, we have over 500 members.

2. Prospective *amicus* anticipates that the filing of their brief and related documents will be their only participation in this matter before the Court. Given their minimal involvement in the case good cause exists for a waiver from Local Rule 83.10(a)'s requirements. The Court has granted similar motions on behalf of *amici* in at least two recent cases. *See Utah v. Walsh*, No. 23-cv-00016, ECF 87 (N.D. Tex. Mar. 28, 2023); *All. for Hippocratic Med. v. U.S. Food & Drug Admin.*, No. 22-cv-0223, ECF 94 (N.D. Tex. Apr. 7, 2023) (granting amici's motions to waive local counsel requirement).

3. Pursuant to Local Rule 7.1(a), counsel for Defendant, Plaintiff, and Intervenor do not oppose the filing of *amicus*'s proposed brief in this matter, without reference to local counsel.

4. A proposed order is attached.

CONCLUSION

The Court should grant *amicus curiae* leave to waive the local counsel requirement.

Dated: June 5, 2024

Respectfully submitted,

/s/ Amanda G. Lewis

Amanda G. Lewis

(*pro hac vice* pending)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue NW, Suite 200

Washington, DC 20016

(202) 789-3960

alewis@cuneolaw.com

CERTIFICATE OF WORD COUNT

This document complies with the Court's word count requirement because it contains 242 words.

Dated: June 5, 2024

Respectfully submitted,

/s/ Amanda G. Lewis

Amanda G. Lewis

(*pro hac vice* pending)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue NW, Suite 200

Washington, DC 20016

(202) 789-3960

alewis@cuneolaw.com

CERTIFICATE OF CONFERENCE (Local Rule 7.1)

I hereby certify that on May 29, 2024, I conferred with counsel for Plaintiff, counsel for Intervenor, and counsel for the Federal Trade Commission (FTC) for their position on this motion. Counsel for Plaintiff, Intervenor, and the FTC consent to the relief requested in the motion.

Dated: June 5, 2024

Respectfully submitted,

/s/ Amanda G. Lewis

Amanda G. Lewis

(*pro hac vice* pending)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue NW, Suite 200

Washington, DC 20016

(202) 789-3960

alewis@cuneolaw.com

CERTIFICATE OF SERVICE

I hereby certify that, on June 5, 2024, I electronically filed this document using the ECF System, which will send notification to the ECF counsel of record.

Dated: June 5, 2024

Respectfully submitted,

/s/ Amanda G. Lewis

Amanda G. Lewis

(*pro hac vice* pending)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue NW, Suite 200

Washington, DC 20016

(202) 789-3960

alewis@cuneolaw.com